

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ABDUL MOHAMMED,

Plaintiff,

v.

UBER TECHNOLOGIES, INC., et al.,

Defendants.

No. 21-cv-3261

Honorable Sharon Johnson Coleman

DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT

Defendants Uber Technologies, Inc. (“Uber”), Raiser, LLC (“Raiser”), and Dara Khosrowshahi (“Khosrowshahi”) (collectively, the “Uber Defendants”) and Littler Mendelson, P.C. (“Littler”), Jody Boquist (“Boquist”), and Jennifer Schilling (“Schilling”) (collectively, the “Littler Defendants”) (the Uber Defendants and Litter Defendants hereafter referred to collectively as “Defendants”), by and through their undersigned counsel, respectfully move for dismissal of Plaintiff’s Complaint in its entirety and with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6). The arguments and authorities supporting Defendants’ Motion to Dismiss are set forth in their Memorandum of Law in Support of their Motion to Dismiss Plaintiff’s Complaint which was filed contemporaneously with this Motion and are incorporated herein by reference.

WHEREFORE, Defendants Uber Technologies, Inc., Raiser, LLC, Dara Khosrowshahi, Littler Mendelson, P.C., Jody Boquist, and Jennifer Schilling respectfully request that judgment be entered in their favor, that Plaintiff’s Complaint be dismissed in its entirety, with prejudice, and that Defendants be awarded any further relief deemed just and appropriate.

Dated: November 12, 2021

Respectfully submitted,

**UBER TECHNOLOGIES, INC., RAISER,
LLC, DARA KHOSROSHAHI, LITTLER
MENDELSON, P.C., JODY BOQUIST, and
JENNIFER SCHILLING**

/s/ Kerri Feczko

One of Their Attorneys

Jennifer Schilling
jschilling@littler.com
Kerri Feczko
kfeczko@littler.com
LITTLER MENDELSON P.C.
321 North Clark Street, Suite 1100
Chicago, IL 60654
Telephone: 312.372.5520
Facsimile: 313.372.7880

*Attorneys for Defendants Uber Technologies, Inc.,
Raiser, LLC, and Dara Khosrowshahi*

Jennifer Youpa (*Appearing Pro Hac Vice*)
jyoupa@littler.com
LITTLER MENDELSON P.C.
2001 Ross Avenue, Suite 1500
Dallas, TX 75201
Telephone: (214) 880-8100
Kerri Feczko
kfeczko@littler.com
LITTLER MENDELSON P.C.
321 North Clark Street, Suite 1100
Chicago, IL 60654
Telephone: 312.372.5520
Facsimile: 313.372.7880
*Attorneys for Littler Mendelson, P.C., Jody Boquist,
and Jennifer Schilling*

CERTIFICATE OF SERVICE

Kerri Feczko, an attorney, hereby certifies that on November 12, 2021, she caused a copy of ***Defendants' Motion to Dismiss Plaintiff's Complaint*** to be electronically filed with the Clerk of the U.S. District Court, Northern District of Illinois, using the CM/ECF (*electronic case filing*) system, which sent notification via electronic mail of such filing to the all ECF participants of record, including:

ABDUL MOHAMMED
258 East Bailey Rd., Apt. C
Naperville, IL 60565
aamohammed@hotmail.com

Robert R. Stauffer
rstauffer@jenner.com
David Jimenez-Ekman
Djimenez-ekman@jenner.com
Katharine R. McLaughlin
kmclaughlin@jenner.com
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, IL 60654
Telephone: 312.222-9350
Facsimile: 312.527.0484

Attorneys for Jenner & Block, LLP, Reid Schar, Megan Poetzel, and Daniel Bobier

Gina Arquilla DeBoni
gdeboni@rblaw.net
Jason J. Friedl
jfriedl@rblaw.net
ROMANUCCI & BLANDIN, LLC
321 N. Clark Street, Suite 900
Chicago, IL 60654
Telephone: 312.458.1000
Facsimile: 312.458.1004

Attorneys for Antonio Romanucci, and Romanucci & Blandin, LLC

/s/ Kerri Feczko
Kerri Feczko